



**BURLINGTON
ENVIRONMENTAL**

RCRA PERMIT
ADMINISTRATIVE RECORD
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RCRA PERMITS SECTION

November 12, 1993

CERTIFIED MAIL

Mr. David Croxton
U.S. EPA
1200 Sixth Avenue, M/S HW-106
Seattle, WA 98101

Mr. Croxton:

As agreed in our meeting on November 3, 1993, and in our phone call on November 9th, the following information and tasks will be completed regarding the Burlington Environmental Inc. Georgetown and Pier 91 Facility corrective action projects. The issues discussed in the 11/3/93 meeting were presented by the USEPA in letters dated October 15th (Pier 91) and October 19th (Georgetown).

PIER 91

1. *Pump Test:* Burlington will submit a revised Pump Test Workplan incorporating the comments in 1.a. and 1.b. and will provide the rationale for the selection of a conceptual model and analytical method to analyze the pump test data. Burlington will submit this by 11/22/93.
2. *Substitution of Well 39-3:* USEPA will await Burlington's response to USEPA comments on the Interim Measures Justification Question due 11/25/93, and Burlington will await USEPA's written determination on the applicability of RCRA Corrective Action and MTCA on the clean up of Pier 91, prior to further resolution of this issue. No submittals are required by Burlington.
3. *Monitoring Well W-10:* USEPA will respond to Burlington (anticipated by November 25, 1993) regarding the follow-up information submitted to USEPA on October 5th. No submittals are required by Burlington.
4. *Tidal Monitoring Test:* USEPA will review the March 1993 tidal monitoring test data presented in the Draft RFI Report (October 1993), and provide future comment on the need for a second tidal test. No submittals are required by Burlington.

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Other: Also discussed was the need to place a deep well (CP-107B) centrally along the western boundary of the Burlington facility. The placement of this well was initially deferred based on the results of the tidal study and the pump test. Burlington will provide comment to USEPA on the need for this well based on current data in the absence of having completed the pump test. Burlington will submit this by 11/22/93.

GEORGETOWN

1. *Water Level Measurements:* These issues were resolved at the meeting. No submittals are required by Burlington or USEPA.
2. *RFI Progress Report, Pg. 5:* These issues were resolved at the meeting. No submittals are required by Burlington or USEPA.
3. *Denver Avenue Sewer Line and Item 4:* On December 6, 1993, Burlington will submit the rationale and schedule for the placement of additional step-out wells, and a description and schedule for any further work planned for the Denver Avenue Sewer. On December 20, 1993, Burlington will submit information collected on the Denver Avenue Sewer as described in the August 1993 Semi-annual Progress Report, including information on the native soil fill interface and the effects of other industrial users of Denver Ave./Lucile St. sewer. The December 20th report will also address possible sources of contamination detected in the CG-102 wells.

If you have any questions please contact me at (206) 654-8153.

Sincerely,



John Stiller
Project Coordinator

cc: Galen Tritt - Ecology NWRO

